

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARC REICHBART, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER  
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-01876-NIQA

CLASS ACTION

JOSEPH STALLONE, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER  
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-01901

CLASS ACTION

**COORDINATED PLAINTIFFS' MOTION TO CONSOLIDATE CASES  
AND APPOINT INTERIM CO-LEAD CLASS COUNSEL**

For the reasons set forth in the accompanying Memorandum of Law, Coordinated Plaintiffs Marc Reichbart and Joseph Stallone in the above-captioned actions respectfully request that the Court (1) consolidate the above-captioned Related Actions pursuant to Fed. R. Civ. P. 42(a) under the caption of the first-filed *Reichbart* docket, No. 2:24-cv-01876-NIQA, and administratively close the *Stallone* matter; (2) appoint Mariya Weekes of Milberg Coleman Bryson Phillips Grossman, PLLC, Andrew W. Ferich of Ahdoot & Wolfson PC, and Kristen Lake Cardoso of

Kopelowitz Ostrow P.A. as interim co-lead class counsel pursuant to Fed. R. Civ. P. 23(g)(3); (3) create a Plaintiffs' Steering Committee to be comprised of three lawyers or three law firms that file future related actions, to be installed by interim class counsel, to assist with the prosecution of this complex litigation; and (4) set a deadline for Plaintiffs to file a consolidated complaint within 30 days of any Order granting this Motion.

A proposed Order has been filed contemporaneously herewith.

Dated: May 6, 2024

/s/ Andrew Ferich

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*Proposed Interim Co-Lead Counsel*

*\*pro hac vice* pending or to be filed

**CERTIFICATION PURSUANT TO L. CIV. R. 7.1(d)**

In compliance with L. Civ. R. 7.1(d), the undersigned certifies that on this 6<sup>th</sup> day of May, 2024, the foregoing motion and its accompanying documents were sent via certified mail/return receipt requested to Defendant Financial Business and Consumer Solutions, Inc., at its principal place of business, located at 330 S. Warminster Road, Suite 353, Hatboro, Pennsylvania 19040.

**CERTIFICATE OF SERVICE**

The undersigned further certifies that on this 6<sup>th</sup> day of May, 2024, a true and correct copy of the above and foregoing was filed with the Clerk of Court via the Court's CM/ECF system for electronic service on all counsel of record.

Dated: May 6, 2024

/s/ Andrew Ferich

Andrew Ferich (PA I.D. 313696)